

REMARKS/ARGUMENTS

Favorable consideration of this application, as presently amended and in light of the following discussion, is respectfully requested.

Claims 33-37, 39-44 and 77 are pending in the present application. Claims 33-35 and 77 are amended by the present amendment. Support for the present amendment is found in Applicants' originally filed disclosure. Thus, no new matter is added.

In the outstanding Action, Claims 33, 37, 40, 41, 43, 44 and 77 were rejected under 35 U.S.C. §103(a) as unpatentable over Marcial et al. (U.S. Pat. No. 7,340,421, herein "Marcial") in view of Princen (U.S. Pat. Pub. No. 2005/031780); Claims 34, 35, 36 and 39 were rejected under 35 U.S.C. §103(a) as unpatentable over Marcial and Princen in view of Bellinger (U.S. Pat. No. 6,023,705); and Claim 42 was rejected under 35 U.S.C. §103(a) as unpatentable over as unpatentable over Marcial and Princen in view of Ashcroft et al. (U.S. Pat. No. 7,364,667, herein "Ashcroft").

Addressing now the rejection of Claims 33, 37, 38, 40, 41, 43 and 44 as unpatentable over Marcial and Princen, Applicants respectfully traverse this rejection.

Amended Claim 33 recites, in part,

- a central processing unit;
- a source database to store source data pertaining to a financial account, the source data including at least one source document, the source data exhibiting a source balance;
- an application database to store ledger data pertaining to the financial account, the ledger data exhibiting a ledger balance; and
- an account reconciliation application executing, using the central processing unit, at the application database to create reconciliation documents that associate items of the ledger data with corresponding items of the source data pertaining to the financial account and determine reconciliation rules to reconcile any differences between corresponding portions of the source balance and the ledger balance, the reconciliation documents being based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger

balance are to be reconciled, the account reconciliation application creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles.

Marcial describes a computer based system for reconciling corporate books and subsidiary books.

Princen describes a computing system for managing accounting data and particularly for managing invoices. Further, Princen describes that many received invoices are set up differently and thus are not easily entered into an accounting system. Thus, in Princen, the computer system includes reconciliation rules which match elements on the received invoices to corresponding elements in the accounting system.

However, the combination of Marcial and Princen does not describe or suggest an account reconciliation application executing, using the central processing unit, at the application database to create reconciliation documents that associate items of the ledger data with corresponding items of the source data pertaining to the financial account and determine reconciliation rules to reconcile any differences between corresponding portions of the source balance and the ledger balance, the reconciliation documents being based in part on reconciliation profiles, the reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled, the account reconciliation application creating the reconciliation profiles by way of a profile creation screen that enables input of information used to establish the reconciliation profiles.

The outstanding Action asserts on pages 7-8 that “Marcial anticipates a reconciliation profile, as described by Applicant, which determines how to balance the accounts.” In addition, the Action asserts “the specific creation method of the reconciliation profile is described in Princen, where a user, via a screen defines a reconciliation rule to be applied to

specific documents.” In response, Applicants submit that the cited combination fails to disclose reconciliation profiles which define how the financial account is to be reconciled by, at least, defining how the *source balance* and the *ledger balance* are to be reconciled.

The outstanding Action asserts on page 3 that col. 5, lines 6-35 of Marcial discloses the claimed reconciliation documents that 1) associate items of the ledger data with corresponding items of the source data pertaining to the financial account and 2) determine reconciliation rules to reconcile any differences between corresponding portions of the source balance and the ledger balance. Applicants respectfully traverse this assertion.

Specifically, this portion of Marcial describes a process whereby a subsidiary compares their general ledger bookings against parent bookings to determine variances. Such variances are addressed by a reconciliation process. However, nothing in Marcial discloses associate items of the ledger data with corresponding items of the *source data* pertaining to the financial account.

In other words, Marcial describes a process of reconciling differences between two companies’ ledger balances. Nothing in Marcial relates in any way to associating items of the *ledger data* with corresponding items of the *source data*. Moreover, nothing in Marcial relates to reconciliation rules to reconcile any differences between corresponding portions of the *source balance* and the *ledger balance*. Applicants note that reconciling two ledger balances is not equivalent to reconciling a source balance and a ledger balance.

In addition, the outstanding Action asserts that the “rules” used to match elements on received invoices to corresponding elements in the accounting system in Princen are equivalent to the claimed “reconciliation profiles”, Applicants respectfully traverse this assertion.

Specifically, in the claimed invention, the reconciliation profiles determine the reconciliation rules and thereby determine how the *source balance* and the *ledger balance* are

to be reconciled. In contrast, in Princen, the “rules” simply help the system to determine, for example, if the element entitled “Name of Company” on an invoice is equivalent to the database element entitled “Co. Identifier.” This type of reconciliation is not equivalent to the claimed reconciliation profiles determining how the financial account is to be reconciled by, at least, determining the reconciliation rules and thereby how the source balance and the ledger balance are to be reconciled.

Accordingly, Applicants respectfully submit that Claim 33, and claims depending therefrom, patentably distinguish over Marcial and Princen considered individually or in combination.

Moreover, none of the further cited Bellinger and Ashcroft references cures the above noted deficiencies of Marcia and Princen with regard to the claimed invention.

In addition, with regard to Claim 77, Applicants respectfully submit that this claim also patently distinguishes over the combination of Marcial and Princen for reasons in addition to this claim’s dependence from Claim 33.

Specifically, nothing in the combination of Marcial and Princen describes or renders obvious that the reconciliation profiles define how the financial account is to be reconciled by associating only a portion of the items of ledger data and the corresponding items of source data pertaining to the financial account with a particular reconciliation profile.

In other words, Claim 77 recites that a particular reconciliation profile may only be associated with a portion of the items of ledger data and the corresponding items of source data. This allows different pairs of items of ledger data and source data to be reconciled differently. This feature is not disclosed in the cited combination as this combination never describes or suggests *associating only a portion of the items of ledger data and the corresponding items of source data pertaining to the financial account with a particular reconciliation profile.*

The outstanding Action asserts on page 8 that the features of Claim 77 are “specifically anticipated by Princen” as the rules of Princen are “created in order to define how to process the next invoice.” Moreover, the outstanding Action asserts that “an invoice is simply a portion of the ledger data and the source data.” However, Applicants respectfully traverse this assertion.

Specifically, “an invoice” (such as the one described in Princen) is in fact a source document and determining how to match a source document to the organization of an accounting system is not equivalent to associating only a portion of both the items of *ledger data* and the corresponding items of *source data* pertaining to the financial account *with a particular reconciliation profile*.

For instance, in a non-limiting example, reconciliation profile “A” may have ten items of source data and corresponding items of ledger data associated therewith. For these items associated with reconciliation profile “A”, the reconciliation rule may be to average the source balance and ledger balance for each of these items. In contrast, reconciliation profile “B” which may have ten different items of source data and corresponding items of ledger data associated therewith. For these items with reconciliation profile “B”, the reconciliation rule may be to always use the ledger balance for each of these items. These advantageous features are not disclosed by the combination of Marcial and Princen or by the further cited Bellinger reference.

Thus, Applicants respectfully submit that Claim 77 also patentably distinguishes over the above noted cited references.

Consequently, in view of the present amendment, no further issues are believed to be outstanding in the present application and the present application is believed to be in condition for formal allowance. An early and favorable action is therefore respectfully requested.

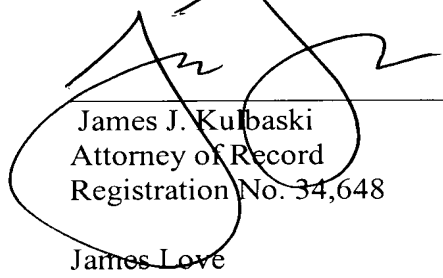
Respectfully submitted,

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